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9 LIMITED PARTNERSHIP (erroneously sued as  
10 ALLTECK LINE CONTRACTORS, INC.)

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16 Attorney for Plaintiffs J.P., a minor, by and  
17 through her guardian ad litem MEGANN PITTS,  
18 and MEGANN PITTS

19 **UNITED STATES DISTRICT COURT**

20 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

21 J.P., a minor, by and through her Guardian Ad  
22 Litem MEGANN PITTS, and MEGANN  
23 PITTS, individually,

24 Plaintiffs,

25 v.

26 ALLTECK LINE CONTRACTORS, INC.,  
27 and DARREN KELLY,

28 Defendants.

Case No. 2:20-cv-01056-JAM-DMC

29 **JOINT STIPULATION FOR AN  
30 EXTENSION OF THE EXPERT  
31 DISCLOSURE DATES IN PRETRIAL  
32 SCHEDULING ORDER BY 75 DAYS;  
33 ORDER**

34  
35 Plaintiffs JP and MEGANN PITTS (“Plaintiffs”), through their counsel  
36 Walkup, Melodia, Kelly & Schoenberger, and Defendants ALLTECK LINE  
37 CONTRACTORS, INC., and DARREN KELLY (hereinafter “Defendants”),  
38 through their counsel Klinedinst PC, hereby stipulate and seek Court approval for

1 the following:

2 **STIPULATION**

3 Since this Court's Status (Pre-Trial Scheduling) Order of October 8, 2020, the  
4 parties have exchanged written discovery. Although this is a motor vehicle accident  
5 case, the injuries are complex and treatment is ongoing. Many medical disciplines  
6 are involved. In this regard, the medical records are voluminous and current  
7 treatment records are still needed for review by qualified professionals before  
8 conducting independent medical examinations and preparing expert witness reports  
9 required for disclosure.

10 Unforeseen issues in the discovery process, and further issues associated with  
11 Covid 19, have resulted in delays in the subpoena process to obtain relevant medical  
12 records and documentation needed for expert review. This has prevented the Parties  
13 from obtaining all the pertinent records such that additional time is needed to secure  
14 the medical and educational records, perform medical examinations, and to  
15 complete expert reports.

16 The Parties request a 75 day continuance of all expert disclosure deadlines in  
17 order to complete additional discovery, obtain the necessary medical, education, and  
18 treatment records, and to explore the possibility of settling and/or mediating  
19 Plaintiffs' claims. The continuance will not affect the motion or trial dates. Neither  
20 the Plaintiffs nor the Defendants have sought any extensions of time for expert  
21 disclosures from this Court in the litigation of this action.

22 Accordingly, the parties request to modify the Scheduling Conference Order  
23 as follows:

- 24 (1) Expert Disclosure due by April 14, 2021;  
25 (2) Rebuttal Expert Disclosure due by April 28, 2021;

26  
27 SO STIPULATED.  
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SACRAMENTO, CALIFORNIA 95814

1 Walkup, Melodia, Kelly & Schoenberger  
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5 DATED: January , 2021

6 By: /s/  
7 Richard H. Schoenberger  
Plaintiffs J.P., a minor, by and through  
her guardian ad litem MEGANN  
PITTS, and MEGANN PITTS  
8  
9

10 KLINEDINST PC  
11  
12

13 DATED: January , 2021

14 By: /s/  
15 Natalie P. Vance  
Ernest L. Weiss  
W. Jason Scott  
16 Attorneys for Defendant  
DARREN KELLY and ALLTECK  
LIMITED PARTNERSHIP  
(erroneously sued as ALLTECK LINE  
CONTRACTORS, INC.)  
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SACRAMENTO, CALIFORNIA 95814

## ORDER

Accordingly, for good cause and pursuant to the above Stipulation of the Parties, IT IS HEREBY ORDERED that:

- (1) Expert Disclosure due by April 14, 2021;
  - (2) Rebuttal Expert Disclosure due by April 28, 2021.

IT IS SO ORDERED.

DATED: January 12, 2021

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE